

Honorable Judge Marsha J. Pechman
Hearing Date June 26, 2025
Without Oral Argument

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

KELLI MCCLURE, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

ROCKETREACH LLC,

Defendant.

CAUSE NO. 2:25-cv-00986

**SECOND STIPULATED MOTION TO
EXTEND TIME TO RESPOND TO
COMPLAINT**

Plaintiff Kelli McClure and Defendant RocketReach LLC hereby jointly move the Court for an order extending the deadline for Defendant to respond to Plaintiff's Complaint.

On April 10, 2025, Plaintiff filed the summons and complaint against Defendant in the Superior Court for the State of Washington in and for the County of King ("State Court").

On May 23, 2025, Defendant filed a Notice of Removal to the U.S. District Court for the Western District of Washington.

On May 30, 2025, this Court granted the Parties' Joint Motion to Extend Time to Respond, providing a deadline of July 7, 2025, for Defendant to respond to Plaintiff's

SECOND STIPULATED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT – 1

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**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**
520 PIKE STREET, SUITE 2350
SEATTLE, WA 98101
(206) 709-5900 (MAIN)
(206) 709-5901 (FAX)

1 Complaint. See Docket #11.

2 On June 25, 2025, Defendant requested Plaintiff's consent for additional time to respond
3 to Plaintiff's Complaint, to which Plaintiff agreed.

4 In light of the parties' agreement, to allow Defendant time for further investigation of
5 the claims and underlying facts and to evaluate potential defenses, and because a brief extension
6 will not prejudice Plaintiff, the parties hereby stipulate and agree that Defendant's deadline to
7 respond to the Complaint is extended to July 21, 2025.

8 Now, the parties jointly ask the Court to extend Defendant's deadline to respond to the
9 Complaint to July 21, 2025.

10 WHEREFORE, the parties respectfully request an Order modifying the current case
11 deadlines as described herein.

12 **ORDER**

13 IT IS SO ORDERED that the Defendant's deadline to respond to the Complaint is
14 hereby extended to July 21, 2025.

15 DATED this 27th day of June, 2025

16
17 

18 Marsha J. Pechman
19 United States Senior District Judge

20 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

21 DATED this 27th day of June, 2025.

22 WILSON, ELSER, MOSKOWITZ,
23 EDELMAN & DICKER LLP

24 By: /s/ Patrick Lynch
Patrick Lynch, WSBA #53147
520 Pike Street, Suite 2350

Seattle, WA 98101
(206) 709-6665 (direct)
(206) 709-5900 (main)
(206) 709-5901 (fax)
Patrick.lynch@wilsonelser.com

Attorney for Defendant

DATED this 27th day of June, 2025.

/s/ Timothy W. Emery
Timothy W. Emery, WSBA #34078
Patrick B. Reddy, WSBA #34092
Paul Cipriani, WSBA #59991
EMERY REDDY PLLC
600 Stewart St., Suite 1100
Seattle, WA 98101
Telephone: (206) 442-9106
Facsimile: (206) 441-9711
emeryt@emeryreddy.com
redryp@emeryreddy.com
paul@emeryreddy.com

Joseph I. Marchese, *Pro Hac Vice*
Matthew A. Girardi, *Pro Hac Vice*
BURSOR & FISHER, P.A.
1330 Avenue of the Americas, 32nd Floor
New York, NY
Telephone: (646) 837-7127
Facsimile: (212) 989-9163
jmarchese@bursor.com
mgirardi@bursor.com

Attorneys for Plaintiff

SECOND STIPULATED MOTION TO EXTEND
TIME TO RESPOND TO COMPLAINT – 3

CAUSE NO. 2:25-cv-00986

**WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP**
520 PIKE STREET, SUITE 2350
SEATTLE, WA 98101
(206) 709-5900 (MAIN)
(206) 709-5901 (FAX)